

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

**IN RE: Thomas Doyle &  
Nina Doyle**

**CASE NO: 15-16646**

**Debtor(s)**

**CHAPTER 13**

**JUDGE ARTHUR I. HARRIS**

**DEBTORS' MOTION TO INCUR DEBT TO PURCHASE MOTOR VEHICLE**

NOW COME THE DEBTORS, and move this court for an order, pursuant to Amended Administrative Order 98-1, authorizing debtor to incur of debt to purchase a 2017 Dodge Journey.

1. The purchase will be financed in the approximate amount of \$16,398.11 with an interest rate of 17.25%, monthly payments of \$370.00, Financing is being provided by Tidewater Finance Co..

2. The reason for the proposed purchase is that debtors currently own a 2003 Ford Windstar which is no longer running and repairs are too costly. Replacement of this vehicle is a prudent use of debtors' resources and is essential to their ability continue employment for the benefit of their creditors.

3. Debtors have sufficient income to meet this monthly obligation.

4. Debtors will pay the initial cash deposit of \$1,500.00.

5. Debtors have no relationship with Tidewater Finance Co.

6. Debtors attach a copy of the Retail Buyers Order and proposed Retail Installment Sale Contract. Although the order states it can be for a similar vehicle, debtors have the described vehicle in their possession.

WHEREFORE, the Debtor prays this Court permit them to incur debt to purchase a 2017 Dodge Journey.

Respectfully submitted,

BALENA LAW FIRM LLC

/s/ William J. Balena

April 18, 2019

\_\_\_\_\_  
Date

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William J. Balena, Member (0019641)  
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**CERTIFICATION**

The undersigned attorney for Debtor, hereby certifies that on the April 18, 2019, a copy of the Motion to Incur Debt was forwarded via regular U.S. Mail and/or ECF to the following parties of interest:

Lauren Helbling, Chapter 13 Trustee, Via ECF at [ch13trustee@ch13cleveland.com](mailto:ch13trustee@ch13cleveland.com)

Thomas and Nina Doyle, 6157 Mills Creek Lane, North Ridgeville, OH 44039.

Respectfully submitted,

/s/ William J. Balena

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William J. Balena (0019641)  
Attorney for Debtors